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July 14, 2025

VIA ECF

Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Conference adjourned to July
28, 2025 at 4:30pm.
So Ordered.

[Handwritten signature]
7/14/25 U.S.D.S.

Re: Bprotocol Foundation et al. v. Universal Navigation Inc. et al., C.A. No. 1:25-cv-04214-JGK

Dear Judge Koeltl:

Our firm represents defendant Universal Navigation Inc. d/b/a Uniswap Labs ("Uniswap Labs") in the above-referenced case. Pursuant to Your Honor's Individual Practices, we write to request an adjournment of the Pre-Motion Conference scheduled for July 16, 2025, at 3:00 p.m. (Dkt. No. 28) to a new date on or between July 28 through August 1.

On July 7, 2025, defendants Uniswap Labs and Uniswap foundation each filed letter-briefs requesting a pre-motion conference for their anticipated Fed. R. Civ. P. 12(b)(6) motion (Dkt. Nos. 26 and 27). On July 9 the Court entered an Order granting those letter briefs and scheduled a Pre-Motion Conference on July 16 at 3:00 p.m. (Dkt. No. 28). Lead counsel and the majority of counsel for Uniswap Labs will be at trial and unavailable during this Court's scheduled Pre-Motion Conference. Due to this conflict, Uniswap Labs respectfully requests that the Court reset the date for the Pre-Motion Conference to a date on or between July 28 through August 1.

This is Uniswap Labs' first request for an adjournment of this Pre-Motion Conference. The other parties—plaintiffs and co-defendant Uniswap Foundation—consented to this request for adjournment. The requested adjournment will not affect any other scheduled dates in this case.

Respectfully submitted,

[Handwritten signature of Josh A. Krevitt]

Josh A. Krevitt
Gibson, Dunn & Crutcher LLP

Cc: All Counsel of Record (via ECF)